

STATE OF SOUTH CAROLINA

BEFORE THE PUBLIC SERVICE COMMISSION

DOCKET NO. 2018-9-E

In the Matter of:)	
)	
South Carolina Electric & Gas)	PETITION TO INTERVENE
Company's Integrated Resource Plan)	
(IRP))	
)	

The South Carolina Coastal Conservation League (“CCL”), and Southern Alliance for Clean Energy (“SACE”) (collectively, “Petitioners”), through counsel, hereby petition the Public Service Commission of South Carolina (“Commission”), pursuant to R. 103-825 of the Commission’s rules, to intervene in the above-captioned docket. In support of this petition, Petitioners state as follows:

1. South Carolina Electric & Gas Company (“SCE&G”) is an investor-owned utility that is regulated by the Commission. S.C. Code Ann. § 58-3-140 (2012). The Commission regulates and supervises SCE&G as to, among other things, its rates, services, facilities, and practices. *Id.*; *see also* R. 103-810 of S.C. Code of Regs. (citing S.C. Code Ann., §§ 58-27-10 *et seq.*). SCE&G’s rates, services, facilities, and practices are relevant to, and in part a function of, the development of its integrated resource plan (“IRP”).

2. SCE&G must prepare an IRP, submit the IRP to the State Energy Office every three years and update the IRP on an annual basis, and file the IRP with the Commission pursuant to the requirements established by the Commission. *See* S.C. Code Ann. § 58-37-40 (2012) and Commission Order Nos. 1998-502, 2010-124 and 2012-96.

3. An IRP filed with the Commission must contain a 15-year demand and energy forecast; the utility's program for meeting its forecast requirements in an economic and reliable

manner, including both demand-side and supply-side options; a brief description and summary of cost-benefit analysis, if available, of each option considered, including those not selected; and the supplier's or producer's assumptions and conclusions with respect to the plan's effect on the cost and reliability of energy service, and a description of the external, environmental and economic consequences of the plan to the extent practicable. Commission Order No. 1998-502; *see also* S.C. Code Ann. § 58-37-10 (2012).

4. In Order No. 2012-96, the Commission declared that “the Commission’s integrated resource planning process will constitute a proceeding under Section 103-804(Q) of our regulations, into which intervention is permitted.” Order at 1. In rendering this decision, the Commission noted that “[t]he IRP process is an important planning tool for the Companies and the Commission,” and that “a transparent and open process in this regard allows for increased sharing of information and ideas, which is valuable to all interested parties.” *Id.* at 2. The Commission indicated that in future IRP dockets, intervention requests would be considered by the Commission. *Id.* at 1.

5. On February 28, 2018, SCE&G filed its 2018 Integrated Resource Plan (“SCE&G 2018 IRP”), which was entered in the above-captioned docket.

6. Petitioners seek to intervene in this docket to advocate for integrated resource planning that evaluates resource alternatives and results in a low-cost, reliable portfolio of supply- and demand-side resources with minimal harmful environmental impacts and costs to ratepayers.

7. CCL is a nonprofit corporation organized under the laws of the State of South Carolina. The principal address of CCL is P.O. Box 1765, Charleston, South Carolina 29402. As an advocate for conservation and energy efficiency, CCL supports development of energy

policy that is in the public interest of South Carolinians. CCL has members in South Carolina who receive electricity service from SCE&G and who would be subject to the impacts of SCE&G's integrated resource planning, which influences decision-making about supply- and demand-side resources utilized and impacts the cost of electricity.

8. SACE is a nonprofit organization whose mission is to promote responsible energy choices that create global warming solutions and ensure clean, safe and healthy communities throughout the Southeast. The principal address of SACE is P.O. Box 1842, Knoxville, Tennessee 37901. SACE also has offices in Florida, Georgia, North Carolina and South Carolina. SACE and its members have an interest in promoting greater reliance on clean, low-cost energy, and have an interest in SCE&G's IRP. SACE has members in South Carolina who receive electricity service from SCE&G and who would be subject to the impacts of SCE&G's integrated resource planning, including resource selection and the cost of electricity.

9. According to SCE&G's IRP, "[t]he objective of the Company's IRP is to develop a resource plan that will provide reliable and economically priced energy to the Company's customers while complying with all environmental laws and regulations." SCE&G 2018 IRP at 3. The provision of reliable and economical electricity, and all decisions related thereto, impacts Petitioners and their members. A utility's IRP and the resource mix contained therein impacts the cost of electricity to customers. Moreover, the manner in which SCE&G conducts its integrated resource planning, and whether it does so in a fiscally and environmentally responsible manner, is directly relevant to the purpose of Petitioners' organizations. Accordingly, Petitioners and their members have a direct interest in this proceeding.

10. Petitioners propose to provide their position on the IRP through written comments and may also request an ex parte briefing before the Commission.

11. Petitioners are represented by the following counsel in this proceeding:

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WHEREFORE, Petitioners pray that they be allowed to intervene in this matter.

Respectfully submitted this 8th day of March, 2018.

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I certify that the following persons have been served with one (1) copy of **South Carolina Coastal Conservation League and Southern Alliance for Clean Energy's Petition to Intervene** by electronic mail at the addresses set forth below:

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This the 8th day of March, 2018.

s/ Anna M. Crowder